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MEMORANDUM

TO: The Commission

FROM: Christopher Hughey
Acting General Counsel

Stephen Gura
Deputy Associate General Counsel

BY: Mark Shonkwiler *MS*
Assistant General Counsel

Camilla Jackson Jones *CJJ*
Attorney

DATE: December 14, 2010

SUBJECT: MUR 6267 (Paton) – Pre-Probable Cause Conciliation

Attached is a [] conciliation agreement which settles the violations of 2 U.S.C. § 441i(e)(1)(A) and 11 C.F.R. § 110.3(d) by Jonathan Paton, Paton for Senate and Jonathan Paton, in his official capacity as Treasurer, and Jonathan Paton for Congress and Jeffrey John Hill, in his official capacity as Treasurer, which involved the improper use of \$7,566 in non-federal funds from Paton's state campaign committee for activities undertaken on behalf of his start-up federal committee. Attachment 1. The agreement also settles Mr. Paton's violation of 2 U.S.C. § 432(e)(1) for failing to timely file a Statement of Candidacy. *Id.*

RECOMMENDATIONS

1. Accept the attached signed conciliation agreement with Jonathan Paton, Paton for Senate and Jonathan Paton, in his official capacity as Treasurer, and Jonathan Paton for Congress and Jeffrey John Hill, in his official capacity as Treasurer;
2. Approve the appropriate letters; and
3. Close the file.

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